

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

GREGORY L. BARNES,)	
)	
Plaintiff,)	CASE NO:
)	
v.)	Hon. Judge
)	
BOARD OF TRUSTEES OF THE UNIVERSITY)	
OF ILLINOIS,)	
)	
Defendant.)	

COMPLAINT

NOW COMES the Plaintiff, GREGORY L. BARNES by and through his attorneys, The Barclay Law Group, P.C., and in support of his complaint against the Defendant, BOARD OF TRUSTEES OF THE UNIVERSITY OF ILLINOIS, complains as follows:

NATURE OF THE ACTION

1. Plaintiff, GREGORY L. BARNES (“Barnes”) brings this action pursuant to Title VII of the Civil Rights Act of 1964 as amended 42 U.S.C. §2000e et seq., to remedy acts of employment discrimination perpetrated against him by Defendant. Plaintiff contends that Defendant discriminated against him by refusing to promote him to the position of Chief Engineer because of his race (African-American). Plaintiff demands trial by jury.

PARTIES

2. Barnes is a resident of Cook County Illinois and is an African American male.

3. Defendant BOARD OF TRUSTEES OF THE UNIVERSITY OF ILLINOIS is the governing body of the University of Illinois system.

JURISDICTIONAL STATEMENT

4. On or about April 19, 2016 Barnes filed a charge of discrimination with the Equal Employment Opportunity Commission (“EEOC”), which was cross filed with the Illinois Department of Human Rights (“IDHR”). (A true and correct copy of the charge of discrimination is attached as Exhibit “A.”)

5. On or about May 27, 2016 Barnes received a right to sue letter from the EEOC. (A true and correct copy of the right to sue letter is attached as Exhibit “B.”)

6. Jurisdiction is conferred for the Title VII claims by 28 U.S.C. § 1331, 28 U.S.C. § 1343(a)(3), and 42 U.S.C. § 2000e-5(f)(3).

JURISDICTION AND VENUE

7. This Court has jurisdiction over the subject matter of this civil action pursuant to Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e et seq. amended by the Civil Rights Act of 1991 (“Title VII”) and 28 U.S.C. §§ 1331 and 1343 (a)(4).

8. Venue is proper in this District pursuant to 28 U.S.C. § 1391(c). Defendant is subject to personal jurisdiction in this District in that it maintains a facility and conducts business operations in this District.

FACTUAL ALLEGATIONS

9. Barnes was hired by Defendant in February of 2008 as an Engineer of Steam and Power Plant No. 3 for the University of Illinois at Chicago (“UIC”).

10. In June of 2010 Barnes was promoted by Defendant to Assistant Chief Engineer Steam and Power Plant No. 4 at UIC.

11. In January of 2016 Barnes applied for a promotion as Chief Engineer at the UIC location.

12. Barnes did not receive the position.

13. Instead, the position was awarded to a white male who had less experience than Plaintiff and which Plaintiff had trained.

14. At all times material to this action, Plaintiff received performance evaluations of satisfactory or better.

15. Barnes was qualified for the position of Chief Engineer.

16. At all times material to this action Defendant took no disciplinary action against Plaintiff and had no valid criticism of his work.

FAILURE TO PROMOTE IN VIOLATION OF TITLE VII

17. Plaintiff re-alleges and incorporates by reference herein the allegations of paragraphs 1 through 16, inclusive, as set forth above.

18. Defendant failed to promote Barnes to the position of Chief of Engineer.

19. By the conduct described above Defendant violated Title VII.

WHEREFORE, Plaintiff GREGORY L. BARNES prays that this court enters an order granting the following relief:

- a) Compensatory damages in excess of Fifty Thousand Dollars (\$50,000.00);
- b) A permanent injunction requiring Defendant to abolish discrimination;
- c) Attorney fees and costs; and
- d) Any further and different relief that the court deems appropriate.

Respectfully submitted,
GREGORY L. BARNES

By: s/Terri Blanchard
One of His Attorneys

Terri Blanchard
The Barclay Law Group, P.C.
111 W. Washington, Suite 1520
Chicago, IL 60602
(312)553-0123